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WRITER S DIRECT DIAL NUMBER

December 14, 1990



BY HAND

SDMS DocID 559373

Cynthia E. Catri
Assistant Regional Counsel
Office of Regional Counsel
U.S. Environmental Protection Agency
One Congress Street
Boston, Massachusetts 02203-2211

Superfund Records Center
SITE: Coakley
BREAK: 119
OTHER: 559373

Re: Coakley Landfill, North Hampton, N.H.
(Data General Corporation)

Dear Ms. Catri:

As noted in my letter of December 12, 1990, I enclose a second affidavit from a Data General employee with knowledge of Data General's waste segregation practices.

Very truly yours,

Thomas G. Fiore

Enclosure

cc: William Robinson, Esq.

AFFIDAVIT OF MARTIN GLEBUS

I, MARTIN GLEBUS, under oath do hereby depose and say:

1. I have been employed by Data General Corporation since December 1, 1975. At present I am a Manufacturing Planning Specialist located in Southboro, MA.
2. From December 1979 through December 1983 I served as Corporate Trouble Shooter and Materials Manager. In this position I was knowledgeable of the Manufacturing Operations at the Portsmouth facility.
3. As Corporate Trouble Shooter and Materials Manager, I was familiar with established procedures for the handling of waste materials generated by the Manufacturing Operations at the Portsmouth facility.
4. Throughout the period of December 1979 through December 1983 in which I served as Corporate Trouble Shooter and Materials Manager, hazardous wastes (such as waste oil, flux, solvents, and solder) were segregated for separate disposal and stored in a locked, fenced area behind the Portsmouth facility building prior to disposal. At no time was hazardous waste mixed with non-hazardous waste/regular trash.
5. A dumpster for non-hazardous wastes (such as paper, cardboard, and office trash) was located at the rear of the building near the Shipping and Receiving area, which area was located at the opposite end of the facility from the fenced area where hazardous wastes were held prior to disposal.

Signed under the pains and penalties of perjury
this eleventh day of December 1990.



Martin Glebus